

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

GILBERT MEDICAL BUILDING LLC,
and AKY MD GILBERT, LLC,

Plaintiff,

v.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA,

Defendant.

Case No. 20-CV-896-R

DEFENDANT'S WITNESS LIST

COMES NOW the Defendant, Travelers Casualty Insurance Company of America,
and identifies the following as its list of witnesses:

	<u>Witness</u>	<u>Testimony</u>
1.	Dr. James Gilbert, MD c/o Plaintiff's Counsel	Facts and circumstances regarding Plaintiff's insurance claim
2.	Ken Smart	Facts and circumstances regarding Plaintiff's insurance claim and maintenance of building
3.	Corporate Representative Gilbert Medical Building, LLC	
4.	Corporate Representative AKY MD Gilbert, LLC	

	<u>Witness</u>	<u>Testimony</u>
5.	Duwayne Crawford c/o Defense Counsel PO Box 309 Claremore, OK 74018 918-343-4100	Facts and circumstances regarding Plaintiff's insurance claim, adjustment of claim
6.	Deborah Scarlett c/o Defense Counsel PO Box 309 Claremore, OK 74018 918-343-4100	Facts and circumstances regarding Plaintiff's insurance claim, adjustment of claim
7.	Coy Jennings c/o Defense Counsel PO Box 309 Claremore, OK 74018 918-343-4100	Facts and circumstances regarding Plaintiff's insurance claim, adjustment of claim
8.	Shawn O'Roark c/o Defense Counsel PO Box 309 Claremore, OK 74018 918-343-4100	Facts and circumstances regarding Plaintiff's insurance claim, adjustment of claim
9.	Steven Gray Grayco 300 Ozark Trail Dr., Ste. 210 Ellisville, MO	Retained expert witness. Will provide expert roofing and architectural opinions; observations from Rule 34 inspection, Rule 26 report. Education and experience testimony.
10.	Dr. Jason Webster AtmoSci PO Box 16082 Chicago, IL 60616	Retained expert witness. Will provide expert meteorology opinions; Rule 26 report. Education and experience testimony.
11.	Anthony C. Milo Madsen, Kneppers & Associates, Inc. 3651 Eldorado Parkway McKinney, TX 75070	Non-retained, hybrid fact/expert witness. Facts and circumstances regarding inspection, observations, etc. regarding Plaintiffs' insurance claim and subject building. Expert opinions. Education and experience testimony.

	<u>Witness</u>	<u>Testimony</u>
12.	Former and present tenants of subject property not otherwise objected to by Defendant	
13.	Appropriate records custodians if necessary	Authentication of documents, if necessary
14.	All witnesses identified through discovery not otherwise objected to by Defendant	
15.	Any witnesses identified in any deposition or discovery response not otherwise objected to by Defendant	
16.	All witnesses listed by Plaintiffs not otherwise objected to by Defendant	
	Defendant reserves the right to amend this list as discovery is still ongoing	

Respectfully submitted,

**TAYLOR, FOSTER, MALLETT, DOWNS,
RAMSEY & RUSSELL**

s/Darrell W. Downs

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